

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

(1) Sean M. FRYER 2018-01280
(Name of Plaintiff) (Inmate Number)

1371 N Washington Ave
(Address) Scranton, PA 18509

(2) _____
(Name of Plaintiff) (Inmate Number)

(Address)

(Each named party must be numbered,
and all names must be printed or typed)

vs.

(1) Federal Bureau of Investigation
(2) Michelle Olshefski
(3) _____
(Names of Defendants)

(Each named party must be numbered,
and all names must be printed or typed)

3-14cv92
(Case Number)

CIVIL COMPLAINT

**FILED
SCRANTON
JAN 14 2019**

PER GF
DEPUTY CLERK

TO BE FILED UNDER: X 42 U.S.C. § 1983 - STATE OFFICIALS

X 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

N/A

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

A. Is there a prisoner grievance procedure available at your present institution? Yes No

B. Have you fully exhausted your available administrative remedies regarding each of your present claims? Yes No

C. If your answer to "B" is Yes:

1. What steps did you take? I have filed Request slips as well as grievances.
2. What was the result? Nothing everyone tells me that they can't help me.

D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS

(1) Name of first defendant: Federal Bureau of Investigation

Employed as _____ at _____
Mailing address: _____

(2) Name of second defendant: Michelle Wisniewski

Employed as _____ at _____
Mailing address: _____

(3) Name of third defendant: _____

Employed as _____ at _____
Mailing address: _____

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. On September 10, 2018 I was arrested at my grandmother's residence at 1125 Reynolds Ave Taylor, PA 15517 without being told why I was being

arrested or shown an arrest warrant.

2. I was entrapped online by a federal agent prior to my arrest which I believe to be a violation of my Constitutional Rights as an American Citizen.
3. Upon being arrested I have been placed in Ad Seg after being confined in a camera cell on two different occasions for about a week each time after being forced to strip naked and given a velcro vest that didn't fit me and wouldn't stay closed. No one would give me another one upon request.

V. RELIEF (Please see back)

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I want to be monetarily compensated in the amount of 5 million dollars.

2. Release me from jail.

3.

Being placed in Ad Seg does not allow me to participate in any programs the prison has to offer. I requested to have counsellor and was told by the psychiatrist on staff that the prison doesn't offer that.

4. When I was placed in a camera cell on 10/12/18 I was denied visitation when my family came to visit me. When my family came to visit me they were advised of my medical situation by the clerical official that conducts visitation procedures and my family was not authorized to have that information divulged to them. Prison officials never sought out my approval to ~~not~~ release that information to them.
5. After being arrested I inquired about obtaining my arrest warrant and all affidavits associated with it and was advised to contact my attorney. He failed to obtain it for me. His name is Leo Latella. I was then told that Chris Kane is the federal liaison for the prison and that he might be able to help. I asked Paul Robertson who is the designated counsellor for the Ad Seg unit I am confined to and expressed that he already contacted my attorney and did not want to hear anything else that I had to say and said "I don't give a shit." verbatim.
6. Details of the entrapment include one agent trolling social media looking for random innocent people to coerce into committing a sex crime. I have no prior convictions of deviant sexual behavior so they had no right to begin an investigation involving me. One agent contacting me and explained of someone who was soliciting sexual behavior with a prepubescent boy. (see attached...)

- I was concerned for the child's safety upon receipt of this information so I contacted the person who I was told about for further details in hopes of having more information to provide to authorities. He was very manipulative making sure not to provide specific identifying information making me skeptical in contacting my local authorities.
- He advised that he wanted to speak to me on the phone pretending he was being friendly to entice me to give him my phone number but he gave me his instead. So I called the number to find out if he was telling the truth. The information was so vile and far fetched that I figured he was just making it up so I didn't follow through with reporting it because authorities would think I was the person making up stories and not take me seriously.
- Now this situation is being held against me to destroy my character and imprison me for a very long time. Those phone calls were obviously recorded against my knowledge which I feel is an invasion of my privacy.
- Because this agent's behavior online was causing me much emotional distress and was making me feel physically sick to my stomach I told him I was going to kill myself which I seriously felt like doing because I was so distraught.

when he was told this he contacted my mother for some reason and just told her that he dialed the wrong number instead of advising her of my current mental state and contacting local authorities on his part to ensure my safety.

- I feel that he should have stopped contact with me but he decided to continue to harass me to make certain a crime occurred that I could be incarcerated for.
- Because of all the stress of this situation I am experiencing extreme chest pain every day as well as dizziness and migraines/vertigo that medication does not help.

After my recent detention hearing on 12/10/18 the judge advised she would suggest counselling after ordering to keep me detained. Then the jail advised that could not happen because Dr Malik is responsible for that and during previous conversations with him he specifically told me the person does not offer talk therapy. Then the counsellor by the name of Paul Robertson specifically said that "he did not give a shit" when I brought my concerns to him. Those were his words verbatim.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11th day of December, 2018.

Sean Michael Freyer
(Signature of Plaintiff)